



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

MAR 24 2016

via UPS

Karla Mercer, EHS Manager
US Ecology, Inc.
730 Vogelsong Road
York, PA 17404

Re: Request for Information Pursuant to Section 3007(a) of the Resource
Conservation and Recovery Act, 42 U.S.C. § 6927(a), Regarding Generation and
Management of Hazardous Waste by Pyromet
EPA ID No. PAD049617822
Reference Number: C16-015

Dear Ms. Mercer:

The U.S. Environmental Protection Agency, Region III ("EPA") is requesting
information from US Ecology, Inc. and any related entities (such as branches and subsidiaries)
regarding the following company:

Pyromet
5 Commerce Drive
Aston, PA 19014
EPA ID No. PAD049617822

EPA is requesting this information pursuant to the authority granted to it under
Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C.
§ 6927(a), which provides in relevant part that "any person who generates, stores, treats,
transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request
of any officer, employee or representative of the Environmental Protection Agency, duly
designated by the Administrator, . . . furnish information relating to such wastes" EPA
hereby requires that you furnish to EPA, within **twenty-one (21) calendar days** of receipt of this
letter, the information requested below, including all documents responsive to such request.

For each and every request, if you have any reason to believe that there may be a
person(s) who may be able to provide a more detailed or complete response to such request or
provide additional responsive documents, then as a part of your response to such request, identify
each such person and the additional information or documents which such person may be able to
provide. Furthermore, for each and every response, if information or documents responsive to

such request are not in your possession, custody or control, then as part of your response to such request, identify each person from whom such information or documents may be obtained.

Please provide a separate narrative response to each information request. Precede each answer with the number of the question or letter of the subpart of the request to which it corresponds. A request for documents shall be construed as a request for any and all documents maintained by you or in your custody, control, or possession or in the possession, custody or control of any of your employees or agents, relating to the matters described below. All copies of documents submitted to EPA in response to the following requests must be complete and legible.

As used herein, the term "document" means: writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonograph records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer print outs, or other data compilations from which information can be obtained or translated.

All other terms used in this request for information that are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.*, 40 C.F.R. Parts 260-266, 268, and 273 (1998 ed.), or 25 Pa. Code Chapters 260a-266a, 266b, and 268a (effective May 1, 1999) shall have the meanings set forth therein.

Please provide the information requested below:

Information Request

1. Please submit copies of all Treatment, Storage and Disposal Facility (TSDF) signed manifests for all shipments of material received from Pyromet (EPA ID# PAD049617822), 5 Commerce Drive, Aston, PA for the period of March 1, 2013 up to receipt of this letter.
2. Please submit copies of all Land Disposal Restriction (LDR) Notices for all shipments of material received from Pyromet for the period of March 1, 2013 up to receipt of this letter, if applicable.
3. Please submit copies of all waste profiles and/or waste analyses, including analytical results, pertaining to any materials received from Pyromet for the period of March 1, 2013 up to receipt of this letter.
4. For each shipment received from Pyromet as requested above, please provide the following (in your response you may group shipments together if they were handled in an identical way):

- a. how was the material managed once it was received at US Ecology?
- b. what processes, if any, were applied to the material, including but not limited to treatment, recovery, refining, stabilization, disposal?
- c. what, if any, saleable materials were recovered from the shipment?
- d. what was the final destination for the material?
- e. was the material transferred from US Ecology to any other facility? If so, please supply that facility's name, address and EPA ID#, as well as the amount and type of material transferred and the date of transfer. Please provide copies of all manifests, bills of lading, etc. documenting such transfer(s), if applicable.

The provisions of Section 3008 of RCRA, 42 U.S.C. § 6928, authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 3007(a) of RCRA. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings. **Your response must include the signed and dated certification found on the final page of this letter.**

With regard to the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"), please see the "Information for Small Businesses" memo, enclosed, which might be applicable to your facility. This enclosure provides information on contacting the SBREFA Ombudsman to comment on federal enforcement and compliance activities and also provides information on compliance assistance. As noted in the enclosure, any decision to participate in such program or to seek compliance assistance does not relieve your facility of its obligation to respond in a timely manner to an EPA request or other enforcement action, create any rights or defenses under law, and will not affect EPA's decision to pursue an enforcement action. To preserve your facility's legal rights, you must comply with all rules governing the administrative enforcement process. The Ombudsman and fairness boards do not participate in the resolution of EPA's enforcement actions. EPA has not made a determination as to whether or not your facility is covered by SBREFA.

Your facility is entitled to assert a claim of business confidentiality covering any part or all of the information submitted, in a manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to your facility.

This request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Please send your response to:

Martin Matlin (3LC70)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

If you have any questions concerning this matter, please contact Mr. Matlin at (215) 814-5789.

Sincerely,

A handwritten signature in cursive script, reading "Carol Amend".

Carol Amend, Associate Director
Land and Chemicals Division
Office of Land Enforcement

Enclosures

cc: Martin Matlin (3LC70) w/o enc.
Pauline Belgiovane (3LC70)

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

NAME (print or type)

SIGNATURE

DATE

